<u>REMARKS/ARGUMENTS</u>

Favorable consideration of this application, in light of the following discussion, is respectfully requested.

Claims 33-37, 39-44, and 77 are pending in the present application. No claims have been amended or added by the present response. Thus, no new matter is added.

In the outstanding Office Action, Claims 33 and 44 were rejected under 35 U.S.C. §103(a) as unpatentable over <u>Dunn et al.</u> (U.S. Patent No. 5,134,564, hereinafter "<u>Dunn</u>") in view of <u>Petersen et al.</u> (U.S. Patent No. 5,225,978, hereinafter "<u>Petersen</u>"); Claims 37, 40, 41, and 43 were rejected under 35 U.S.C. §103(a) as unpatentable over <u>Dunn</u> and <u>Petersen</u>, in further view of <u>Marcial et al.</u> (U.S. Patent No. 7,340,421, hereinafter "<u>Marcial</u>"); Claims 34-36, 39, and 77 were rejected under 35 U.S.C. §103(a) as unpatentable over <u>Dunn</u> and <u>Petersen</u>, in further view of <u>Bellinger et al.</u> (U.S. Patent No. 6,023,705, hereinafter "<u>Bellinger</u>"); and Claim 42 was rejected under 35 U.S.C. §103(a) as unpatentable over <u>Dunn</u> and <u>Petersen</u>, in view of <u>Marcial</u> and <u>Ashcroft et al.</u> (U.S. Patent No. 7,364,667, hereinafter "<u>Ashcroft</u>").

As an initial matter, Applicants and Applicants' representative thank Examiner Champagne for the courtesy of an interview with Applicants' representative on February 15, 2011. During the interview, differences between the claimed features and the cited references were discussed. Comments discussed during the interview are reiterated below.

Addressing now the rejection of Claims 33 and 44 under 35 U.S.C. §103(a) as unpatentable over <u>Dunn</u> and <u>Petersen</u>, Applicants respectfully traverse this rejection.

Claim 33 recites, in part,

> an account reconciliation application executing, using the central processing unit, at the application database to create reconciliation documents that associate items of the ledger data with corresponding items of the source data pertaining to the financial account and determine reconciliation rules to reconcile any differences

between corresponding portions of the source balance and the ledger balance, the reconciliation documents being based in part on reconciliation profiles, the reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger balance are to be reconciled, the account reconciliation application creating the reconciliation profiles by way of a profile creation screen that enables input of information used to establish the reconciliation profiles, each of the reconciliation profiles having individualized reconciliation rules for reconciliation of the financial account.

The outstanding Office Action asserts, on pages 2-4, that Dunn and Petersen describe all of the features recited in Claim 33. Applicants respectfully traverse this assertion.

Dunn describes a system for computer-aided reconciliation that reconciles a first list (a bank statement) formed of a first number of first records and a second list (bank customer's list of records) formed of a second number of second records where the records affect the account balance for the bank statement.[1]

However, Dunn fails to teach or suggest, as is conceded by the Office Action on page 3, the feature of "the reconciliation documents being based in part on reconciliation profiles, the reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger balance are to be reconciled, the account reconciliation application creating the reconciliation profiles by way of a profile creation screen that enables input of information used to establish the reconciliation profiles, each of the reconciliation profiles having individualized reconciliation rules for reconciliation of the financial account," as is recited in Claim 33. To cure this deficiency of Dunn, the Office Action relies on the Petersen reference.

Petersen discusses a bank document processing system for processing checks, deposit slips, and other financial documents which combines an automatic expert reconciliation

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[1] Dunn: Abstract and columns 3-5.

system with a multi-tasking document processing apparatus.[2]  In addition, Petersen's system

may be customized for regional operations and banking particulars, thus allowing a

predetermined subset of rules to be changed.[3]  According to Petersen, the customization is

carried out during the "install" cycle of the system, at which time the customizer is allowed to

alter the executable code.[4]

Thus, as discussed during the interview, Petersen merely teaches that a system may be

customized for a particular customer (i.e., Bank of America) at the time of installation of the

system.  In other words, Petersen allows certain predetermined subset of rules to be changed

during installation in order to better correspond to the customer's business.  Thus, once the

rules are changed at the time of installation, Petersen applies these rules for all financial

accounts.

Hence, the Petersen reference does not teach the customization of reconciliation rules

*for a financial account* of a specific entity, and thus, fails to show the claimed relationship

between the reconciliation documents, the reconciliation profiles, and the individualized

reconciliation rules.  In particular, Petersen does not describe or suggest that the

*reconciliation documents* are based in part on reconciliation profiles, the *reconciliation*

*profiles determining how the financial account is to be reconciled* by, at least, determining

the *reconciliation rules* and thereby how the source balance and the ledger balance are to be

reconciled, as is recited in Claim 33.  Furthermore, Petersen is also silent on the claimed

feature of *creating the reconciliation profiles* by way of a profile creation screen that enables

input of information used to establish the reconciliation profiles.  Finally, Petersen also fails

to describe that *each of the reconciliation profiles has individualized reconciliation rules*

for reconciliation of the financial account, as is also required by Claim 33.

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[2] Petersen: Abstract.
[3] Petersen: column 16, lines 30-31 and 35-37.
[4] Petersen: column 16, lines 38-39 and 48-49.

The outstanding Office Action relies on <u>Petersen</u>'s column 26, lines 41-67, as teaching the aforementioned claimed features. However, this section of <u>Petersen</u> merely states that customization may include "limited" facility for changing the expert module, and that a specific knowledge base may be loaded with the expert module. Thus, as discussed during the interview, <u>Petersen</u> merely describes a limited customization in which a subset of predefined rules may be changed during the "install" stage of the system for a particular customer.

<u>Petersen</u>, however, does not describe the reconciliation documents, the reconciliation profiles, and that each of the reconciliation profiles has *individualized reconciliation rules for reconciliation of the financial account*, as is required by Claim 33.

Accordingly, <u>Dunn</u> and <u>Petersen</u>, whether taken alone or in combination, do not describe, suggest, or render obvious all of the features recited in Claim 33. Therefore, it is respectfully requested that the rejection of Claim 33, and claims depending therefrom, be reconsidered and withdrawn.

Addressing now the rejection of Claim 77 under 35 U.S.C. §103(a) as unpatentable over <u>Dunn</u>, <u>Petersen</u>, and <u>Bellinger</u>, Applicants respectfully traverse this rejection and respectfully submit that Claim 77 also patently distinguishes over the cited combination for reasons in addition to this claim's dependence from Claim 33.

Claim 77 recites, in part, that

> the reconciliation profiles define how the financial account is to be reconciled by associating only a portion of the items of ledger data and the corresponding items of source data pertaining to the financial account with a particular reconciliation profile.

The outstanding Action asserts, on page 6, that <u>Dunn</u> describes the features of Claim 77. The Office further notes that according to <u>Dunn</u>, "elements such as date [and] amount of

each record from L1 are compared to the corresponding elements of the record in L2."

Applicants respectfully traverse this assertion.

It is respectfully submitted that nothing in Dunn describes or renders obvious that the reconciliation profiles define how the financial account is to be reconciled by associating only a portion of the items of ledger data and the corresponding items of source data pertaining to the financial account with a particular reconciliation profile.

In other words, Claim 77 recites that a particular reconciliation profile may only be associated with a portion of the items of ledger data and the corresponding items of source data. This allows different pairs of items of ledger data and source data to be reconciled differently. This feature is not disclosed in Dunn (or the cited combination) because there is no description or suggestion of *associating only a portion of the items of ledger data and the corresponding items of source data* pertaining to the financial account *with a particular reconciliation profile*.

For instance, in a non-limiting example, reconciliation profile "A" may have ten items of source data and corresponding items of ledger data associated therewith. For these items associated with reconciliation profile "A," the reconciliation rule may be to average the source balance and ledger balance for each of these items. In contrast, reconciliation profile "B" may have ten different items of source data and corresponding items of ledger data associated therewith. For the items with reconciliation profile "B," the reconciliation rule may be to always use the ledger balance for each of these items. It is respectfully submitted that these features are not disclosed by the combination of Dunn, Petersen, and Bellinger.
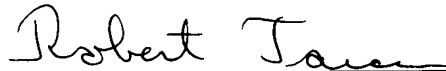
Thus, Applicants respectfully submit that Claim 77 also patentably distinguishes over the above noted cited references.

Accordingly, it is respectfully submitted that pending Claims 33-37, 39-44, and 77 are allowable.

Consequently, in light of the above discussion, no further issues are believed to be outstanding in the present application and the present application is believed to be in condition for formal allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

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